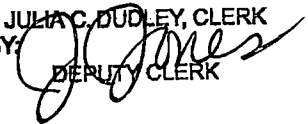


FEB 26 2018

JULIA C. DUDLEY, CLERK  
BY:  DEPUTY CLERK

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division

ELIZABETH SINES, et al.

Plaintiffs,

v.

JASON KESSLER, et al.

Defendants.

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CIVIL ACTION

FILE NO. #:17-cv-00072-NKM

**MOVANT'S OBJECTIONS**

Non-party David Duke hereby serves his objections to the Subpoena to Produce Documents, as follows:

**Document Request No. 1**

*All documents concerning the above-captioned litigation.*

**Objection:** Movant objects to said Document Request on the grounds that it is vague, overbroad and unduly burdensome. Compiling such information would extremely difficult if not impossible and would impose a significant expense upon Movant.

**Document Request No. 2**

*All documents and communications concerning the removal of the Robert E. Lee statue from Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages*

*on Discord.*

**Objection:** Movant objects to said Document Request on the grounds that it is overbroad and unduly burdensome. Compiling such information would extremely difficult if not impossible and would impose a significant expense upon Movant.

Document Request No. 3

*All documents and communications concerning any rally or event on August 12, 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord, that anticipated, planned, publicized, reported on, or otherwise concern such rally or event.*

**Objection:** Movant objects to said Document Request on the grounds that it is vague, overbroad and unduly burdensome. Compiling such information would extremely difficult if not impossible and would impose a significant expense upon Movant.

Document Request No. 4

*All documents and communications sufficient to identify your accommodations on the night of August 12, 2017, as well as your transportation to and from any rally or event on August 12, 2017, in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on*

*Twitter, and messages on Discord.*

**Objection:** Movant will produce documents sufficient to identify his accommodations on the night of August 12, 2017 and transportation to and from any rally or event on August 12, 2017 but objects to the remainder of said Document Request on the grounds that it is vague, overbroad, unduly burdensome and irrelevant.

Document Request No. 5

*All documents and communications sufficient to identify any entity with which you are affiliated that provided financial support or assisted in organizing any rally or event on August 12, 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord.*

**Objection:** Movant objects to said Document Request on the grounds that it is so vague, ambiguous and confusing that Movant cannot be reasonably expected to know which documents in his possession, custody or control, if any, may be considered responsive to the request.

Document Request No. 6

*All documents and communications concerning any rally or event on August 11, 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord, that anticipated, planned, publicized, reported on, or otherwise concern such rally*

or event.

**Objection:** Movant objects to said Document Request on the grounds that it is vague, overbroad and unduly burdensome. Compiling such information would be extremely difficult if not impossible and would impose a significant expense upon Movant.

Document Request No. 7

*All documents and communications sufficient to identify your accommodations on the night of August 11, 2017, as well as your transportation to and from any rally or event on August 11, 2017, in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord.*

**Objection:** Movant will produce documents sufficient to identify his accommodations on the night of August 11, 2017 and transportation to and from any rally or event on August 11, 2017 but objects to the remainder of said Document Request on the grounds that it is vague, overbroad, unduly burdensome and irrelevant.

Document Request No. 8

*All documents and communications concerning any meeting on August 11, 2017, related to Charlottesville, Virginia, including but not limited to the meeting attended by Christopher Cantwell, Robert "Azzmador" Ray, and Elliot Kline, also known as Eli Mosley, including all communications via text messages, email, Facebook messages, tweets, direct*

*messages on Twitter, and messages on Discord.*

**Objection:** Movant can produce the requested documents if given sufficient time to search his records.

Document Request No. 9

*All documents and communications concerning any rally or event on July 8, 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord, that anticipated, planned, publicized, reported on, or otherwise concern such rally or event.*

**Objection:** Movant objects to said Document Request on the grounds that it is vague, overbroad and unduly burdensome. Compiling such information would be extremely difficult if not impossible and would impose a significant expense upon Movant.

Document Request No.10

*All documents and communications concerning any rally or event on May 13, 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, direct messages on Twitter, and messages on Discord, that anticipated, planned, publicized, reported on, or otherwise concern such rally or event.*

**Objection:** Movant objects to said Document Request on the grounds that it is

vague, overbroad and unduly burdensome. Compiling such information would extremely difficult if not impossible and would impose a significant expense upon Movant.

Document Request No. 11

*All documents and communications concerning any efforts to solicit donations for yourself or on behalf or any other person, related to any rally or event in May, July, or August, of 2017 in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord.*

**Objection:** Movant objects to said Document Request on the grounds that it is so vague, ambiguous and confusing that Movant cannot be reasonably expected to know which documents in his possession, custody or control, if any, may be considered responsive to the request.

Document Request No. 12

*All documents and communications concerning any donations received by you or any entity with which you are affiliated that participated in or supported the rally or event in August 11, 2017, in Charlottesville, Virginia, including but not limited to all communications via text messages, email, Facebook messages, tweets, direct messages on Twitter, and messages on Discord.*

**Objection:** Movant objects to said Document Request on the grounds that it is so

vague, ambiguous and confusing that Movant cannot be reasonably expected to know which documents in his possession, custody or control, if any, may be considered responsive to the Request.

Document Request No. 13

*All documents and communications between you and any of the following individuals:*

- a. Christopher Cantwell;*
- b. Robert "Azzmador" Ray;*
- c. Elliot Kline a/k/a Eli Mosley;*
- d. Jason Kessler;*
- e. Richard Spencer;*
- f. James Alex Fields, Jr.;*
- g. Andrew Anglin;*
- h. Nathan Damigo;*
- l. Matthew Heimbach;*
- J. Matthew Parrott a/k/a David Matthew Parrott;*
- k. Michael Hill;*
- l. Michael Tubbs;*
- m. Jeff Schoep;*
- n. Augustus Sol Invictus;*
- o. Michael "Enoch" Peinovich.*

**Objection:** Movant objects to said Document Request on the grounds that it is

overbroad, lacking any time or relevance limitation, unduly burdensome and irrelevant.

Document Request No. 14

*All documents and communications to, from, or concerning the following entities:*

- a. The Daily Stormer (including the Daily Stormer's "book clubs");*
- b. Vanguard America ;*
- c. Moonbase Holdings, LLC;*
- d. Identity Evropa;*
- e. Traditionalist Worker Party;*
- f. League of the South;*
- g. National Socialist Movement;*
- h. Nationalist Front;*
- i. Fraternal Order of the Alt-Knights;*
- J. Loyal White Knights of the Ku Klux Klan;*
- k. East Coast Knights of the Ku Klux Klan a/k/a East Coast Knights of the True Invisible Empire;*
- L Any other organization with "Knights" in its name; and*
- m. Any other organization with "Ku Klux Klan" in its name.*

**Objection:** Movant objects to said Document Request on the grounds that it is overbroad, lacking any time or relevance limitation, unduly burdensome and irrelevant.



This 23<sup>rd</sup> day of February, 2018.

Respectfully submitted,

/S/ David Duke

A handwritten signature in black ink, appearing to be 'David Duke', written over a horizontal line.

David Duke  
240 Garden Avenue  
Mandeville, LA 70471  
(985) 869-0720  
ernestduke@hotmail.com